

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUTTES

VICTIM RIGHTS LAW CENTER, et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION,
et al.,

Defendants.

Civil Action No. 25-11042-MJJ

DECLARATION OF RACHEL OGLESBY

1. My name is Rachel Oglesby. I make this Declaration based on my own personal knowledge, on information contained in the records of the Department of Education, or on information provided to me by Department of Education employees.
2. I am currently employed as Chief of Staff for the U.S. Department of Education, headquartered in Washington, D.C. I began my service at the Department on January 20, 2025.
3. Before joining the Department, I worked at America First Policy Institute as the Chief State Action Officer and Director of the Center for the American Worker.
4. In my role at the Department, I have the following responsibilities:
 - a. I assist the Secretary of Education with all her responsibilities running the Department.
 - b. I advise the Secretary on significant matters within and affecting the Department.
5. I submitted declarations in the cases of *New York v. McMahon*, Case No. 25-10601-MJJ and *Somerville Public Schools v. Trump*, Case No. No. 25-10677-MJJ, on June 3, 2025, June 10, 2025, June 17, 2025, June 24, 2025, July 1, 2025, and July 8, 2025, the latter two of which included compliance information specific to the preliminary injunction issued by this Court on June 18, 2025 regarding the Department's Office for Civil Rights (the "OCR Order"). I further submitted a declaration in this case regarding the OCR Order on July 15, 2025. I incorporate herein by reference the statements made in my previous declarations. Due to the stay ordered by the United States Supreme Court issued on July 14, 2025, in the aforementioned *New York* and *Somerville* cases, this declaration addresses compliance activities specific to the OCR Order.

6. Senior officials from the ad hoc committee described in my earlier declarations held discussions on July 18 and July 22 addressing OCR-specific reintegration activities. By July 22, 2025, the Department had:
 - Identified the number of OCR employees who received RIF notices on March 11, 2025 and who have not secured outside employment or otherwise voluntarily resigned or retired since March 11, 2025 (to date, 276 employees) such that they are available to be reintegrated to active duty.
 - Identified OCR employees who received RIF notices on March 11, 2025, who have secured outside employment which they intend to continue to prepare for approval or denial of such outside employment consistent with applicable ethics rules.
 - inventoried regional offices that have available space for OCR employees versus regional offices that do not currently have available space to determine which OCR employees in each regional area will need to be directed to submit telework agreements for remote work.
 - Confirmed the capacity of contract IT support services to accommodate the needs of additional employees working remotely.
 - Continued the process of IT restoration and updating as to government furnished equipment (GFE) for OCR employees.
 - The Department has identified approximately 100 OCR employees who received RIF notices on March 11, 2025, who had not yet returned their GFE when the Department terminated its agencywide GFE collection processes in accordance with the preliminary injunction issued in the *New York* and *Somerville* cases referenced in Paragraph 5 of this declaration (which preliminary injunction was stayed on July 14, 2025).
 - The IT restoration process (including, for instance, reimaging and updating to Windows 11) will differ for the approximately 100 OCR employees who have retained their GFE, distinguishing between employees whose IT restoration will occur onsite and those for whom IT restoration will occur remotely, and arranging for the Department to ship boxes to employees for returning their original GFE in exchange for restored GFE.
 - Discussed with the OCR ad hoc committee representatives reintegration strategies including planning for enforcement teams to have manageable numbers of members and team leads.
 - Continued to pay the salaries and benefits of OCR employees who received RIF notices on March 11, 2025, and have been on paid administrative leave since March 21, 2025, at a cost to the Department of nearly \$1 million per week.
 - Ensured that OCR continues to process, investigate, and resolve complaints:
 - From March 11 to July 21, 2025, OCR received 5,780 complaints; opened 353 for investigation; opened 26 directed investigations; dismissed 4,074 complaints consistent with OCR's Case Processing Manual; resolved 106 complaints after investigation concluded insufficient evidence for findings; and resolved 331 complaints with voluntary agreements, OCR-mediated

settlements, or technical assistance from OCR to ensure a recipient's digital resources are accessible to students with disabilities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, DC this 22nd day of July.



Rachel Oglesby